EXHIBIT B

From: Meyerov, Viktoriya

Sent: Wednesday, March 09, 2005 11:35 AM

To: Roper, MaryCatherine; D'Ambra, Andrea; Torregrossa, Maresa

Subject: FW: FindLaw Daily Opinion Summaries for U.S. Supreme Court - 03/07/05

----Original Message-----

From: Smith, Beth [mailto:bsmith@attorneygeneral.gov]

Sent: Wednesday, March 09, 2005 10:20 AM

To: Meyerov, Viktoriya

Subject: RE: FindLaw Daily Opinion Summaries for U.S. Supreme Court - 03/07/05

I have no objection to producing (Brenda, not Barbara, by the way) Wildenstein for her deposition. But please realize that Boris is no longer a defendant, following the Court's ruling on the motion to dismiss the second amended complaint. The only DOC defendants remaining in the case are Wildenstein and Shannon. Both of them are now at SCI-Frackville.

Wildenstein and I are both available for March 25. I would prefer the deposition start no earlier than 10:00, and preferably around 10:30 or 11:00, simply because she will have a 2 and 1/2 hour drive from Frackville to Philadelphia, even during non-rush hour.

Tamara Boris is no longer with the DOC and, as noted above, no longer a defendant. She is now working for the Parole Board, in its Sexual Predator Investigation Office, in Harrisburg. I am waiting to hear back from her. When I learn of her availability for deposition, I will request that you send me a deposition subpoena and witness check (\$40 plus mileage or train fare) for that date.

Finally, here is the list of the Parole Board Members and Hearing Examiners who participated in Wolfe's interviews:

March 2001: David Withers, now retired Hearing Examiner

Allen Castor, Board Member

Sept. 2002: Harold Shalon, now retired Hearing Examiner

Barbara Descher, former Board Member

July 2004: Anthony DiBernardo, Hearing Examiner

Allen Castor, Board Member.

Michael Green is currently Acting Chairman of the Parole Board.